

September 8, 2020

**VIA ECF**

Honorable Valerie E. Caproni  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: ***Chevrestt v. Barstool Sports, Inc. (1:20-cv-1949-VEC)***

Dear Judge Caproni:

We represent plaintiff Angel Chevrestt in the above-referenced matter. I respectfully submit this letter in response to Your Honor's Order, dated September 1, 2020 [Dkt. #30].

The reason why I took all three of the courses in Number 5 is because one program in Number 4 entitled *Panel of Lawyers Who are Doing it: Practice Management Technology to Grow Your Solo/Small Law Practice Ethically* was not recorded on video but was only available as a live, in-person event. Thus, I was unable to watch this program on-line. At the time I submitted this course schedule for the Court's approval, I did not realize that this program was only available as a live, in-person event and was not video recorded as was the case with the other programs identified above. I apologize to the Court for this mistake.

Based upon what I learned in the CLE's, the specific and concrete changes I have made – and will continue to make – includes delegating tasks to employees to make the Firm more efficient in managing cases. This includes tasks such as client intake, discovery, motions, calendaring, etc. I am doing this by implementing a plan at the beginning of each week. Also, by making a weekly plan this will improve my time management. In addition, I am actively training and supervising new staff and current staff on new protocols in the office while maintaining a well-balanced and flexible work schedule for employees. The continued education on our practice management software is ongoing. In addition, I plan on taking more CLE courses dedicated to management for small law firms so that I can be continually educated by professionals in the field.

Respectfully submitted,

/s/Richard Liebowitz  
Richard P. Liebowitz

